



New York State Unified Court System

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Request for Judicial Intervention
Commercial Division Addendum

UCS-840C (12/2023)
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Supreme Court
County of NEW YORK

Plaintiff/Petitioner (persons/entities that started the case):

Legacy Restoration, LLC

Index #:

Defendant/Respondent (persons/entities the case is against):

Oswaldo "Junior" Barajas, John Doe Entity 1, Leah Raffles, and Brian Wolff

Plaintiff/Petitioner's cause(s) of action [check all that apply]:

- ☒ Breach of contract or fiduciary duty, fraud, misrepresentation, business tort (e.g., unfair competition), or statutory and/or common law violation where the breach or violation is alleged to arise out of business dealings (e.g., sales of assets or securities; corporate restructuring; partnership, shareholder, joint venture, and other business agreements; trade secrets; restrictive covenants; and employment agreements not including claims that principally involve alleged discriminatory practices)
- Transactions governed by the Uniform Commercial Code, excluding those concerning individual cooperative or condominium units
- Transactions involving commercial real property, including Yellowstone injunctions and excluding actions for the payment of rent only
- Shareholder derivative actions (without consideration of the monetary threshold)
- Commercial class actions (without consideration of the monetary threshold)
- Business transactions involving or arising out of dealings with commercial banks and other financial institutions
- Internal affairs of business organizations
- Malpractice by accountants or actuaries, and legal malpractice arising out of representation in commercial matters
- Environmental insurance coverage
- Commercial insurance coverage (e.g., directors and officers, errors and omissions, and business interruption coverage)
- Dissolution of corporations, partnerships, limited liability companies, limited liability partnerships and joint ventures (without consideration of the monetary threshold)
- Applications to stay or compel arbitration and affirm or disaffirm arbitration awards and related injunctive relief pursuant to CPLR Article 75 involving any of the foregoing enumerated commercial issues (where the applicable agreement provides for the arbitration to be heard outside the United States, the monetary threshold set forth in 22 NYCRR 202.70(a) shall not apply)

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Plaintiff/Petitioner’s claim for compensatory damages, excluding punitive damages, interest, costs, and counsel fees claimed: \$ 500,000.00

Plaintiff/Petitioner’s claim for equitable or declaratory relief [brief description]:

Plaintiff seeks injunctive relief against Defendant Oswaldo "Junior" Barajas on the ground that Barajas has violated certain restrictive covenants contained in a purchase agreement to which he is a party. As a result, Barajas has caused and continues to cause irreparable injury to Plaintiff by virtue of impermissibly disclosing and using confidential information, taking steps to start a competing business, and soliciting employees of Plaintiff.

Defendant/Respondent’s counterclaims, including claims for monetary relief [brief description]:

I request that this case is assigned to the Commercial Division. I certify that the case meets the Commercial Division’s jurisdictional requirements as set forth in 22 NYCRR 202.70(a), (b) and (c).

Dated: 06/25/2025

/s/ Melissa Colon-Bosolet

Signature

Melissa Colon-Bosolet

Print Name